

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN
BY: Kate S. McGrath, Esquire
I.D. #56082
BY: Edward M. Galang, Esquire
I.D. #80958
Suite 1002, One Montgomery Plaza
Norristown, PA 19401
(610) 292-4473

Attorney for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JAMES S. PAVLICHKO, SR.,	:	Civil Action No. 02-CV-2889
As guardian ad litem for a Minor Child,	:	
JAMES S. PAVLICHKO, JR.	:	
VS.	:	
GLEN MILLS SCHOOL,	:	JURY OF 12 DEMANDED
COSIMO D. FERRAINOLA, DIRECTOR,	:	
LARRY LAURENCE, COUNSELOR,	:	
GREG FRAZIER, STAFF MEMBER,	:	
JIM WELSH, STAFF MEMBER,	:	
TODD DONAHUE, STAFF MEMBER,	:	
T.J. GREEN, STAFF MEMBER,	:	
MR. YANEZ, STAFF MEMBER	:	

DEFENDANTS' PROPOSED JURY INTERROGATORIES

1. Do you find that Plaintiff, James Pavlichko, Jr. engaged in protected activity under the First Amendment of the United States Constitution.

_____ Yes _____ No

2. Do you find that Defendants, James Welsh, Nelson Yanez, or Glen Mills Schools responded with retaliation?

James Welsh _____ Yes _____ No

Nelson Yanez _____ Yes _____ No

Glen Mills Schools _____ Yes _____ No

3. Do you find that the cause of the retaliation was the result of the protected activity?

James Welsh _____ Yes _____ No

Nelson Yanez _____ Yes _____ No

Glen Mills Schools _____ Yes _____ No

If your answer to any of the above questions is "no," your deliberations are complete as to that Defendant regarding Plaintiff's First Amendment Retaliation Claim.

4. Did T.J. Green use unreasonable and excessive force against James Pavlichko, Jr.?

_____ Yes _____ No

5. Did T.J. Green commit an assault against James Pavlichko, Jr.?

_____ Yes _____ No

6. Did T.J. Green commit a battery against James Pavlichko, Jr.?

_____ Yes _____ No

7. What compensatory damages do you award James Pavlichko, Jr. as a result of the above?

\$ _____

8. What percentages do you assign to each of the defendants? Your total must not exceed 100 percent.

James Welsh _____ %

Nelson Yanez _____ %

T.J. Green _____ %

Glen Mills Schools _____ %

YOUR DELIBERATIONS ARE COMPLETE. PLEASE HAVE THE FOREPERSON SIGN AND DATE THE VERDICT SHEET AND NOTIFY THE DEPUTY THAT YOU HAVE COMPLETED YOUR DELIBERATIONS.

FOREPERSON

DATE